

Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 1

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

JIDONG ZHANG, )  
vs. Plaintiff,) ) Case Number  
TIPTOP ENERGY PRODUCTION, ) CIV-16-1044-D  
Defendant.)

---

DEPOSITION OF ZHUO WANG  
TAKEN ON BEHALF OF THE PLAINTIFF  
ON OCTOBER 26, 2017  
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY: BRENDA SCHMITZ, CSR, RPR  
CITY REPORTERS, INC.  
117 Park Avenue, Fourth Floor  
Oklahoma City, Oklahoma 73102  
(405) 235-3376

Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 2

1 APPEARANCES:

2  
3 FOR THE PLAINTIFF:

4 MR. J. KELLY WORK  
5 Attorney at Law  
6 105 N. Hudson  
7 Suite 304  
8 Oklahoma City, Oklahoma 73102

9  
10 FOR THE DEFENDANT:

11 MS. MEGHAN NYLIN  
12 Thompson & Knight  
13 One Arts Plaza  
14 1722 Routh Street  
15 Suite 1500  
16 Dallas, Texas 75201

17  
18 Also present: Li Feng  
19 Jidong Zhang

20 INDEX

21  
22  
23  
24  
25

DIRECT EXAMINATION BY MR. WORK .....	4
CROSS EXAMINATION BY MS. NYLIN .....	36

## 1 STIPULATIONS

2 It is hereby stipulated and agreed by and  
3 between the parties hereto, through their respective  
4 attorneys, that the deposition of ZHUO WANG may be  
5 taken on behalf of the Plaintiff on OCTOBER 26, 2017  
6 in the City of Oklahoma City, Oklahoma by Brenda  
7 Schmitz, Certified Shorthand Reporter within and for  
8 the State of Oklahoma, taken by agreement pursuant  
9 to the Federal Rules of Civil Procedure.

10 It is further stipulated and agreed by and  
11 between the parties hereto, through their respective  
12 attorneys, that all objections, except as to the  
13 form of the question and the responsiveness of the  
14 answer, are reserved until the time of trial, at  
15 which time they may be made with the same force and  
16 effect as if made at the time of the taking of this  
17 deposition.

18  
19  
20  
21  
22  
23  
24  
25

## Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 4

1 And thereupon the following witness was produced  
2 by the Plaintiff:

8 DIRECT EXAMINATION

9 BY MR. WORK:

10 Q. Could you please state your name?

11 A. My first name is Z-H-U-O, last name  
12 W-A-N-G. But I go by Zoe.

Q. All right. And where do you live?

14 A. I live in Edmond.

15 Q. What's your residence address?

16 A.

18 Q. And where are you employed?

A. Tiptop Oil and Gas US, LLC.

20 Q. And how long have you been employed there?

21 A. From December 20, 2014.

Q. What is your educational background?

23 A. Master of accounting.

## Q. Accounting?

25 A. Yeah.

1 A. Yes.

2 Q. Were you told what the reason was for  
3 that?

4 A. You mean in the meeting?

5 Q. Well, what were you told about why Susan  
6 was going to no longer be the financial manager?

7 A. What I know is she had a green card.

8 Q. And how does that relate to her no longer  
9 being the financial manager?

10 A. That's SIPC policy.

11 Q. Okay.

12 A. Yeah.

13 Q. But you can't be a manager if you have a  
14 green card?

15 A. Yes.

16 Q. Is that the policy?

17 A. I never read that policy.

18 Q. Okay. I'm just asking what your  
19 understanding was or what you were told.

20 A. Oh, yes.

21 Q. So is that your understanding?

22 A. Yes.

23 Q. That she was removed as financial manager  
24 because she had a green card; is that correct?

25 A. Yes.

1           Q.    Okay. During the time that Susan was  
2 pregnant, were you ever given any instructions or  
3 direction by Xiang Jiang, the financial manager,  
4 about Susan's pregnancy?

5           A.    What do you mean for instruction.  
6 Instruction?

7           Q.    I mean, did he tell you how you should  
8 respond to her or whether or not you should interact  
9 with her or have -- speak to her, or did he give you  
10 any kind of instructions --

11          A.    No.

12          Q.    -- about Susan --

13          A.    No.

14          Q.    -- during her pregnancy?

15          A.    No.

16          Q.    Were you ever instructed to stay away from  
17 Susan by anyone at Tiptop?

18          A.    No.

19          Q.    Were you ever instructed not to speak to  
20 her?

21          A.    No.

22          Q.    Were you ever instructed not -- excuse me,  
23 were you ever instructed by anyone at Tiptop to  
24 avoid interacting with Susan?

25          A.    Avoid interacting. No.

1           Q.    Were you ever at a meeting with the  
2 financial manager, Xiang Jiang, where he instructed  
3 Tiptop employees not to engage with Susan?

4           A.    Nope.

5           Q.    Did you ever hear about any -- that  
6 instruction being given to the Chinese expatriate --

7           A.    No.

8           Q.    -- employees? And please wait, let me  
9 finish my question before you try to answer.

10          A.    Uh-huh.

11          Q.    Just so the record is clear.

12          A.    Uh-huh.

13          Q.    During Susan's pregnancy, were you ever  
14 given any instructions by President Wang about how  
15 you should respond to Susan?

16          A.    No. Oh. No. But Mr. Wang told me Susan  
17 is a hard worker and I need to just learn more from  
18 her. Yeah.

19          Q.    When did he tell you that?

20          A.    I forgot about time, but he told me  
21 several times.

22          Q.    Okay. Was that shortly after you started  
23 working at Tiptop?

24          A.    Yeah, and shortly after I working at  
25 Tiptop, he told me about that. Because I need to go

1 Q. Why did that not apply to you?

2 A. I'm local.

3 Q. You're considered a local employee?

4 A. Uh-huh. Yes, I'm not a full employee in  
5 Tiptop at that time, I'm just an intern.

6 Q. At the time you were pregnant?

7 A. Yes.

8 Q. You were still an intern?

9 A. Yes.

10 Q. All right. Well, do you have any  
11 knowledge of work being withheld from Susan or taken  
12 away from Susan during the time she was pregnant?

13 A. I -- I noticed she had less job than  
14 before.

15 Q. What did you notice about that?

16 A. I can't forgot, sorry.

17 Q. You said that you noticed that she had  
18 less job than before. Is that what you said? Can  
19 you just explain what you mean by that?

20 A. Let me recall my memory. Because before  
21 Susan always worked late, and she work sometimes  
22 during the weekend, but after they knew she was  
23 pregnant, she just -- she just go back home right  
24 after the work. So that is why I thought her job is  
25 worse now, much as before.

1           Q. She wasn't working as many hours as  
2 before?

3           A. She always worked late.

4           Q. Okay. All right. Anything else that you  
5 know about that, about the issue of whether or not  
6 there was any work that was being withheld from her  
7 by Tiptop or taken away from her by Tiptop during or  
8 after her pregnancy?

9           A. No one told me about that, just I felt she  
10 has less job, she had less jobs than before.

11          Q. Just from what you observed?

12          A. Yes.

13          Q. Okay. No one told you anything about  
14 that?

15          A. Yes.

16          Q. Okay. Were you ever asked to report on  
17 Susan's activities to anyone at Tiptop management?

18          A. No.

19          Q. Were you ever asked to notice or to watch  
20 when Susan was at work or not at work?

21          A. No.

22          Q. Did you ever report to President Wang when  
23 Susan was at work or not at work?

24          A. Nope.

25          Q. How about to the financial manager, to

1 Xiang Jiang, did you ever report to him when Susan  
2 was at work or not at work?

3 A. I think just once he ask me if she come --  
4 she comes to work or not.

5 Q. When was that?

6 A. I think it's summertime, but I cannot  
7 forgot.

8 Q. Do you remember, was it before or after --

9 A. Before she --

10 Q. -- Susan had left for maternity leave?

11 A. Before.

12 Q. It was before?

13 A. Uh-huh.

14 Q. While she was still there?

15 A. Yes.

16 Q. Okay. And what did you understand he was  
17 asking of you?

18 A. I really don't know. I didn't ask the  
19 reason.

20 Q. Okay.

21 A. I just tell him.

22 Q. Did he ask you to do anything?

23 A. No.

24 Q. Did you ever report back to him at a later  
25 time about whether or not Susan was at work or not

Zhuo Wang  
Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 39

1 complaint about Mr. Jiang's duties as a financial  
2 manager and whether he misused those or -- or  
3 committed any financial fraud?

4 A. I didn't hear about that. I don't know  
5 about that.

6 Q. Did he give you any details at all when he  
7 said that Susan sued Mr. Jiang, Mr. Wang, and Tina?

8 A. No.

9 Q. Okay. Did you ever have the understanding  
10 that Mr. Jiang did not want Susan to access certain  
11 financial information?

12 A. Okay. There's -- I can remember when that  
13 was, but Mr. Jiang, financial manager, he was on a  
14 vacation or business trip, he's not in -- he was not  
15 in the company at that time, and Susan asked to  
16 enter the file room, but before Mr. Jiang left, he  
17 told me "just don't let anyone into that room", so  
18 Susan asked me the key to the room and I said, "I  
19 don't have a key".

20 Q. Do you know why he asked you that?

21 A. I don't know.

22 Q. Did he mention that that had anything to  
23 do with Susan's pregnancy?

24 A. No.

25 Q. Do you know whether that had anything to

1 do with Susan's pregnancy?

2 A. I don't think so.

3 Q. And why do you say "I don't think so"?

4 A. Why Susan was pregnant and don't let her  
5 into the file room, so it's not related.

6 Q. Okay.

7 A. No.

8 Q. From your perspective, did you stop  
9 talking to Susan after she told everyone within  
10 Tiptop that she was pregnant with her second child?

11 MR. WORK: Object to the form.

12 THE WITNESS: Can you repeat that, repeat  
13 that again so I can understand clearly?

14 Q. Yes.

15 A. Uh-huh.

16 Q. Did you stop talking to Susan after she  
17 informed everyone at Tiptop that she was pregnant  
18 with her second child?

19 MR. WORK: Object to the form.

20 THE WITNESS: I didn't stop talk to her, I  
21 still talked to Susan. No.

22 Q. Were you friends with Susan?

23 A. Yeah, I was friends with Susan. And I  
24 didn't talk to her too much after that, but by the  
25 left, I was still talking and when she had the baby,

1 I was at the hospital, see the baby, and I went to  
2 her house, too, after she went back to her home.

3 Q. Do you recall whether Susan told you  
4 anything about becoming a local employee if she  
5 resigned her employment?

6 A. I hear Susan tell me that Mr. Wang called  
7 her to quit the job and then Tiptop going to hire  
8 her as a local employee.

9 Q. Did she tell you anything else about that?

10 A. Oh. Susan said -- Susan just can't  
11 believe -- can't trust him.

12 Q. So she didn't accept that offer because  
13 she didn't trust Mr. Wang?

14 A. Probably.

15 MS. NYLIN: Okay. Unless there's any  
16 follow-up, I don't have any additional questions.

17 MR. WORK: I don't have any further  
18 questions.

19 MS. NYLIN: And we'll request the ability  
20 to read and sign.

21 MR. WORK: She'll prepare the transcript  
22 of the deposition, you'll get an opportunity to read  
23 it and --

24 THE WITNESS: Okay.

25 MR. WORK: -- make corrections if you feel

Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 43

1

ERRATA SHEET

2

WITNESS: ZHUO WANG

3

DATE: OCTOBER 26, 2017

4

REPORTER: Brenda Schmitz, CSR, RPR

5

NO CORRECTIONS ARE NECESSARY \_\_\_\_\_

6

PAGE	LINE	CORRECTION	REASON
------	------	------------	--------

7

_____	_____	_____	_____
-------	-------	-------	-------

8

_____	_____	_____	_____
-------	-------	-------	-------

9

_____	_____	_____	_____
-------	-------	-------	-------

10

_____	_____	_____	_____
-------	-------	-------	-------

11

_____	_____	_____	_____
-------	-------	-------	-------

12

_____	_____	_____	_____
-------	-------	-------	-------

13

_____	_____	_____	_____
-------	-------	-------	-------

14

_____	_____	_____	_____
-------	-------	-------	-------

15

_____	_____	_____	_____
-------	-------	-------	-------

16

_____	_____	_____	_____
-------	-------	-------	-------

17

_____	_____	_____	_____
-------	-------	-------	-------

18

_____	_____	_____	_____
-------	-------	-------	-------

19

_____	_____	_____	_____
-------	-------	-------	-------

20

_____	_____	_____	_____
-------	-------	-------	-------

21

_____	_____	_____	_____
-------	-------	-------	-------

22

_____	_____	_____	_____
-------	-------	-------	-------

23

_____	_____	_____	_____
-------	-------	-------	-------

24

_____	_____	_____	_____
-------	-------	-------	-------

25

_____	_____	_____	_____
-------	-------	-------	-------

Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 44

1

JURAT

2

I, ZHUO WANG, do hereby state under oath that  
I have read the above and foregoing transcript in  
its entirety, and that the same is a full, true, and  
correct transcription of my testimony so given at  
said time and place, except for the corrections  
noted.

8

9

\_\_\_\_\_

10

11

SUBSCRIBED AND SWORN TO BEFORE ME, the  
undersigned Notary Public in and for the State of  
\_\_\_\_\_ on this, the \_\_\_\_\_ day of  
\_\_\_\_\_, 2017.

15

16

\_\_\_\_\_

17

My Commission Expires: \_\_\_\_\_

18

19

20

21

22

23

24

25

REPORTED BY: BRENDA SCHMITZ, CSR, RPR

Zhang v. Tiptop Energy Production

Zhuo Wang

10/26/2017

Page 45

1 CERTIFICATE

2 STATE OF OKLAHOMA )  
3 ) SS:  
OKLAHOMA COUNTY )

4 I, Brenda Schmitz, Certified Shorthand Reporter  
5 within and for the State of Oklahoma, do hereby  
6 certify that the above-named ZHUO WANG was by me  
7 first duly sworn to testify to the truth, the whole  
8 truth, and nothing but the truth in the case  
9 aforesaid; that the above and foregoing deposition  
10 was by me taken in shorthand and thereafter  
11 transcribed; that the same is true and correct; and  
12 that it was taken on OCTOBER 26, 2017 at the time of  
13 2:20 p.m. in the City of Oklahoma City, County of  
14 Oklahoma, State of Oklahoma under the stipulations  
15 hereinbefore set out, and that I am not attorney for  
16 or relative of any of said parties or otherwise  
17 interested in the event of said action.

18 IN WITNESS WHEREOF, I have hereunto set my hand  
19 and official seal this 10th day of November, 2017.  
20

---

21 BRENDA SCHMITZ, CSR, RPR  
22 Oklahoma Certified Shorthand Reporter  
23 Certificate No. 00823  
24 Expires: December 31, 2017  
25